

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JILL ALTMAN, Individually and on	)	
behalf of a class,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:15-cv-02451-SCJ-
	)	CMS
WHITE HOUSE BLACK MARKET,	)	
INC., and DOES 1-10,	)	
	)	
Defendants.		

**JOINT MOTION TO AMEND SCHEDULING ORDER**

COME NOW Plaintiff, Jill Altman (“Plaintiff”), by agreement with Defendant, White House Black Market, Inc. (“WHBM”), pursuant Fed. R. Civ. P. 6(b) and 16(b)(4), and makes this Motion before the Court to amend the scheduling order in this action. As grounds for this motion, Plaintiff states as follows:

1. Pursuant to the amended scheduling order entered on May 19, 2017 (Doc. 70), Plaintiff’s reply in support of class certification is due on July 21, 2017.
2. It its June 23, 2017 brief in opposition to class certification, WHBM submitted and relied upon the declaration of a WHBM employee, David M. Oliver (“Oliver”), who had not previously been identified as a person having relevant knowledge in either WHBM’s Rule 26 disclosures or its interrogatory responses. On June 27, 2017, Plaintiff served WHBM with a deposition notice seeking the deposition of Mr. Oliver, with the deposition scheduled to take place on July 7,

2017. WHBM's counsel has indicated that it cannot make Oliver available for a deposition earlier than July 20, 2017—*i.e.*, one day before Plaintiff's reply brief is due. As a consequence, the parties have agreed to the extension of the deadline for Plaintiff to file her reply in support of class certification to August 3, 2017.

3. Good cause therefore exists to extend the deadline for Plaintiff to file her reply in support of class certification in order to permit the deposition of Oliver to go forward and to allow Plaintiff sufficient time to incorporate the testimony secured therein into her reply. If the requested extension is granted, no other deadlines will be impacted.

WHEREFORE, the Movants respectfully pray that the Court enter an Order amending the existing scheduling order as follows:

a. Plaintiff's deadline to file her reply in support of class certification shall be moved to August 3, 2017.

Respectfully submitted this 3rd day of July, 2017.

Respectfully submitted,

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*/s/ Bryant T. Lamer*  
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*(admitted Pro Hac Vice)*

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Plaintiff's Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which electronically delivered a copy to the parties listed below.

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/s/ Bryant T. Lamer

An Attorney for Plaintiff

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D**

Pursuant to Local Rule 7.1D, the undersigned counsel certifies that this document has been prepared using 14 Times New Roman point font.

DATED: July 3, 2017

By: /s/ Bryant T. Lamer  
An Attorney for Plaintiff